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August 26, 2021

By Electronic Filing

Hon. Alison J. Nathan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

RE: Estate of Henry Saint Dahl v. Pajares, Pena y Oria, S.L., et al., 20-cv-2334 (AJN)

Dear Judge Nathan,

This letter is in regards to your order for the plaintiff to seek a default judgment. We appreciate your patience in an unusual case.

There are few things that I should alert you, plus a request for the court.

The defendants filed a suit against the Plaintiff in Spain. The parties are actively engaged in settlement negotiations to resolve both this case and the Spanish case. My client believes that the settlement negotiations are fruitful and this matter will likely be resolved out of court.

However, my client would like more time to actively negotiate without the pressure of a close deadline in this case. **My client requests an extension of one month for the deadline to seek a default judgment.**

Respectfully submitted,

/s/ Steven R. Fairchild
Member

cc: All recipients of ECF

The Court GRANTS Plaintiff's extension.
Plaintiff shall file a motion for default
judgment by October 4, 2021.

SO ORDERED.

SO ORDERED.
ALISON J. NATHAN, U.S.D.J. 8/27/21